

ORIGINAL

DOW, LOHNES & ALBERTSON, PLLC  
ATTORNEYS AT LAW

JOHN R. FEORE, JR.  
DIRECT DIAL 202-776-2786  
jfeore@dlalaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802  
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600  
ATLANTA, GEORGIA 30346-2108  
TELEPHONE 770-901-8800  
FACSIMILE 770-901-8874

DOCKET FILE COPY ORIGINAL

RECEIVED

JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 8, 1997

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Attention: Policy and Rules Division  
Stop Code 1800D

Re: MM Docket Nos. 91-221, ~~87-8~~, 94-150, 92-51, and 87-154  
Television Station KAJW(TV), Tolleson, Arizona

Dear Sir or Madam:

We submit herewith an original and four copies of the permittee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of Phoenix-51, Inc. and America 51, L.P., the permittee of Television Station KAJW(TV), Tolleson, Arizona.

Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,

John R. Feore, Jr.

JRF/lkr  
Enclosure

04

# LMA REPLY FORM

MARKET: PHOENIX, ARIZONA

DMA # 17

					Degree of Overlap (%)	Nielsen (all day) Audience Share (9am - midnight)
	Channel No. & <u>Call Sign</u>	Network <u>Affiliation</u>	Licensed <u>Community</u>	Owner/ <u>Licensee</u>	City Grade Grade Grade A B	<u>11/96</u> <u>2/97</u> <u>5/97</u>
Brokered Station:	Channel 51 KAJW(TV)	Independent	Tolleson, Arizona	America 51, L.P.		Station Not On Air
Brokering Station:	None	N/A	N/A	Paxson Communications of Phoenix-51, Inc.	N/A	

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal may be exercised.	% Time Brokered <u>per week</u>
	7/31/96	7 years or until consummation of transactions contemplated by Purchase Agreement (i.e., purchase of Station by Broker).	7/31/96	7/31/03 or upon consummation of transactions contemplated by Purchase Agreement.	Mutually agreed upon term if transactions contemplated by Purchase Agreement have not been consummated prior to expiration of initial term.	Up to 96.4%  (162 hours/week)

**PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA**

The Time Brokerage Agreement for KAJW(TV) was entered into on July 31, 1996, as part of multiple agreements with the permittee of KAJW(TV) in Tolleson, Arizona. The permittee entered into Construction and Lease Agreements with Paxson Communications of Phoenix-51, Inc. and a Time Brokerage Agreement which will provide Paxson with the opportunity to program the new Channel 51 Tolleson station once it is completed and on the air. These Agreements were entered into approximately 6 years after the construction permit was issued by the FCC and will enable the station, which is currently under construction, to commence broadcasting without further delay.